

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

ERICK TORRES, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SCHEAR CONSTRUCTION, LLC,

Defendant.

CASE NO. 1:21-cv-04609-PKC-CLP

**COLLECTIVE / CLASS ACTION
COMPLAINT**

JURY TRIAL DEMANDED

JOINT STATUS LETTER

Pursuant to the Court's Order of November 30, 2021, the parties hereby file their
Joint Status Letter, and state:

1. On August 16, 2021, Plaintiff brought this collective and class action alleging that Defendant violated the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*;
2. On November 23, 2021, Defendant filed its Answer and Affirmative Defenses to Plaintiff's Class/Collective Action Complaint. [DE 17].;
3. On December 2, 2021, the Parties conducted the Court required Rule 26(f) conference.

Currently the Court has scheduled the Initial Conference for December 17, 2021.

Respectfully submitted this 2nd day of December, 2021.

/s/Andrew R. Frisch

Andrew R. Frisch, Esq.
New York Bar No. 3957115
MORGAN & MORGAN, P.A.
8151 Peters Road, 4th Floor
Plantation, Florida 33324
Telephone: (954) WORKERS
Fax: (954) 318-3013
Email: Afrisch@forthepeople.com

Counsel for Plaintiff

/s/ Adam Losey

Adam Losey, Esq.
New York Bar No. 4848867
Losey PLLC
44 Court Street, Suite 1217
Brooklyn, New York 11201
Telephone: (407) 906-1605
Email: alosey@losey.law
docketing@losey.law

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which I understand will send a notice of electronic filing to all parties of record.

/s/ ANDREW R. FRISCH
Andrew R. Frisch